

**IN THE UNITED STATES DISTRICT COURT**  
**MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION**

L.E., by his next friend and parents, )  
SHELLEY ESQUIVEL and )  
MARIO ESQUIVEL, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
BILL LEE, in his official capacity as )  
Governor of Tennessee, et al. )  
 )  
Defendants. )

## **DECLARATION OF JESSICA JERNIGAN-JOHNSON**

Pursuant to 28 U.S.C. § 1746, I, Jessica Jernigan-Johnson, hereby declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age and have direct knowledge of the matters stated herein.
2. Defendants Knox County Board of Education and Superintended Jon Rysewyk, in his official capacity, rely on the attached exhibits in support of their Motion for Summary Judgment filed in this matter.

7. Exhibit 5 is a true and correct copy of excerpts of the deposition of Sara Morrison dated August 22, 2022.

8. I have personal knowledge of the facts in this declaration and, if called to testify, could completely do that.

Dated this 10th day of October, 2022.

s/Jessica Jernigan-Johnson

DAVID M. SANDERS (BPR # 016885)  
Senior Deputy Law Director  
JESSICA JERNIGAN-JOHNSON (BPR # 032192)  
Deputy Law Director  
Suite 612, City-County Building  
400 Main Street  
Knoxville, TN 37902  
(865) 215-2327

*Counsel for Defendants, Knox County  
Board of Education, Knox County Schools  
and Dr. Jon Rysewyk*

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed electronically on the date recorded by the Court's electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties who have filed an appearance in the case, by and through the following counsel:

Sasha Buchert (*pro hac vice*)  
LAMBDA LEGAL DEFENSE AND EDUCATION FUND INC.  
1776 K Street NW, 8th Floor  
Washington, DC 20006-5500  
Tel: (202) 804-6245  
[sbuchert@lambdalegal.org](mailto:sbuchert@lambdalegal.org)

Leslie Cooper (*pro hac vice*)  
L. Nowlin-Sohl (*pro hac vice*)  
Taylor Brown (*pro hac vice*)  
AMERICAN CIVIL LIBERTIES UNION FOUNDATION  
125 Broad St.  
New York, NY 10004  
Tel: (212) 549-2584  
[lcooper@aclu.org](mailto:lcooper@aclu.org)  
[lnowlin-sohl@aclu.org](mailto:lnowlin-sohl@aclu.org)  
[tbrown@aclu.org](mailto:tbrown@aclu.org)

Tara L. Borelli (*pro hac vice*)  
Carl S. Charles (*pro hac vice*)  
LAMBDA LEGAL DEFENSE AND EDUCATION FUND INC.  
1 West Court Square, Suite 105  
Decatur, GA 30030-2556  
Tel: (404) 897-1880  
Fax: (404) 506-9320  
[tborelli@lambdalegal.org](mailto:tborelli@lambdalegal.org)  
[ccharles@lambdalegal.org](mailto:ccharles@lambdalegal.org)

Jennifer Milici  
John W. O'Toole  
Wilmer, Cutler & Pickering Hale and Dorr, LLP  
1875 Pennsylvania Avenue NW  
Washington, DC 20006  
(202) 663-6256  
[jennifer.milici@wilmerhale.com](mailto:jennifer.milici@wilmerhale.com)  
[john.o'toole@wilmerhale.com](mailto:john.o'toole@wilmerhale.com)

Clark Lassiter Hildabrand  
Stephanie A. Bergmeyer  
Tennessee Attorney General's Office  
P.O. Box 20207  
Nashville, TN 37202-0207  
(615) 741-6828  
[clark.hildabrand@ag.tn.gov](mailto:clark.hildabrand@ag.tn.gov)  
[stephanie.bergmeyer@ag.tn.gov](mailto:stephanie.bergmeyer@ag.tn.gov)

Stella Yarbrough (No. 33637)  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF TENNESSEE  
P.O. Box 120160  
Nashville, TN 37212  
Tel: (615) 320-7142  
[syarbrough@aclu-tn.org](mailto:syarbrough@aclu-tn.org)

Alan Schoenfeld (*pro hac vice*)  
WILMER CUTLER PICKERING HALE AND DORR LLP  
7 World Trade Center  
250 Greenwich Street, 45th Floor  
New York, NY 10007  
Tel: (212) 937-7294  
alan.schoenfeld@wilmerhale.com

Matthew D. Benedetto (*pro hac vice*)  
Thomas F. Costello-Vega (*pro hac vice*)  
WILMER CUTLER PICKERING HALE AND DORR LLP  
350 South Grand Avenue, Suite 2400  
Los Angeles, CA 90071  
Tel: (213) 443-5300  
matthew.benedetto@wilmerhale.com  
thomas.costello@wilmerhale.com

Emily L. Stark (*pro hac vice*)  
Samuel M. Strongin (*pro hac vice*)  
Britany Riley-Swanbeck (*pro hac vice*)  
WILMER CUTLER PICKERING HALE AND DORR LLP  
1875 Pennsylvania Ave. NW  
Washington, DC 20006  
Tel: (202) 663-6000  
emily.stark@wilmerhale.com  
samuel.strongin@wilmerhale.com  
britany.riley-swanbeck@wilmerhale.com

s/Jessica Jernigan-Johnson  
JESSICA JERNIGAN-JOHNSON